

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION

WELLS FARGO BANK, N.A.

*Applicant-Movant,*

v.

WILLIAM SNYDER AND SHIRLEY  
SNYDER,

*Adverse Parties-Respondents.*

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Civil Action No. 7:23-cv-00107

**DECLARATION OF DANIEL DURELL**

1. My name is Daniel Durell. I am of sound mind and capable of making this unsworn declaration in accordance with 28 U.S.C. § 1746. I am over the age of twenty-one (21) years and have never been convicted of a felony or crime involving dishonesty. I am fully competent to testify to the matters herein. I have personal knowledge of the facts stated herein, which are true and correct.

2. I am an attorney at Locke Lord LLP, counsel for Applicant-Movant Wells Fargo Bank, N.A., in the above-captioned matter. I have personal knowledge regarding the facts set forth in this declaration based on my representation of Wells Fargo in the underlying state court action and arbitration proceeding described below.

3. Attached to the Declaration as **Exhibit A** is a true and correct copy of Arbitrator Daross's resume provided by AAA to the Parties on October 12, 2022.

4. Attached to this Declaration as **Exhibit B** is a true and correct copy of email correspondence between the Parties' counsel in November and December 2022 related to the submission of the proposed Report and Preliminary Management Hearing and Scheduling Order in the arbitration proceeding.

5. Attached to this Declaration as **Exhibit C** is a true and correct copy of email correspondence between Wells Fargo's counsel and the Arbitrator jointly submitting the Parties' proposed Report and Preliminary Management Hearing and Scheduling Order.

6. Attached to this Declaration as **Exhibit D** is a true and correct copy of Wells Fargo's Motion for Leave to File a Dispositive Motion filed in the arbitration proceeding on March 1, 2023.

7. Attached to this Declaration as **Exhibit E** is a true and correct copy of Wells Fargo's Response in Opposition to Claimant's Motion for Leave to Amend Pleadings filed in the arbitration proceeding on April 25, 2023.

8. Attached to this Declaration as **Exhibit F** is a true and correct copy of Wells Fargo's Reply in Support of Rule 33 Dispositive Motion filed in the arbitration proceeding on April 25, 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed in Austin, Texas, on the 8th day of August 2023.

A handwritten signature in blue ink, appearing to read "Daniel Durell", is written over a horizontal line.

Daniel Durell  
Locke Lord LLP